



Anthony Paronich <anthony@paronichlaw.com>

RE: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

1 message

Cody Towns <ctowns@townslawfirm.com>
To: Anthony Paronich <anthony@paronichlaw.com>

Fri, Sep 29, 2023 at 4:04 PM

Will do. Thank you and have a great weekend.

Cody L. Towns

Towns Law Firm

A Texas Professional Corporation

469.421.1500

469.421.1501 direct

469.421.1505 facsimile

www.TownsLawFirm.com

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From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Friday, September 29, 2023 3:03 PM
To: Cody Towns <ctowns@townslawfirm.com>
Subject: Re: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

Yes, please just accurately reflect our position in the motion, which is that we are open to an extension of discovery, but not staying the case, until after disposition of your rule 12 motion.

On Sep 29, 2023, at 4:01 PM, Cody Towns <ctowns@townslawfirm.com> wrote:

I truly appreciate the offer and your professional courtesy, but we are going to ask the court to postpone discovery until ruling on our upcoming Rule 12b motion, based on the facts as contained in our discovery responses. This is one of the issues that we wished to discuss, but my assumption is that your client(s) would oppose. Please confirm, or we can discuss next week.

Thanks,

Cody

Cody L. Towns

Towns Law Firm

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From: Anthony Paronich <anthony@paronichlaw.com>

Sent: Friday, September 29, 2023 2:48 PM

To: Cody Towns <ctowns@townslawfirm.com>

Subject: RE: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

We're open to a courtesy extension, for sure, but not that the production would come only after a responsive pleading, so how much time were you looking for on the extension?

From: Cody Towns <ctowns@townslawfirm.com>

Sent: Friday, September 29, 2023 3:47 PM

To: Anthony Paronich <anthony@paronichlaw.com>

Subject: RE: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

Anthony,

We are preparing a motion to extend our discovery response time until after our answer deadline, as one of the things I was wanting to discuss (although much of the responsive information that we would not object to has already been produced). I assume that your clients are opposed?

Thanks,
Cody

Cody L. Towns

Towns Law Firm

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From: Anthony Paronich <anthony@paronichlaw.com>

Sent: Thursday, September 28, 2023 3:11 PM

To: Cody Towns <ctowns@townslawfirm.com>

Case 3:23-cv-00145-S Document 76-3 Filed 11/08/23 Page 4 of 6 PageID 298
Subject: RE: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

Hey, Cody. Conversion King's discovery responses are due on October 3. How about we set up a time to discuss after we have those?

From: Cody Towns <ctowns@townslawfirm.com>
Sent: Thursday, September 28, 2023 4:09 PM
To: Anthony Paronich <anthony@paronichlaw.com>
Subject: RE: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

Do you have time for a call to discuss this matter next week?

Thanks,
Cody

Cody L. Towns

Towns Law Firm

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From: Cody Towns
Sent: Monday, September 18, 2023 5:12 PM

Case 3:23-cv-00145-S Document 76-3 Filed 11/08/23 Page 5 of 6 PageID 299

To: Anthony Paronich <anthony@paronichlaw.com>

Subject: Re: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

Thanks.

Cody

On Sep 18, 2023, at 5:09 PM, Anthony Paronich <anthony@paronichlaw.com> wrote:

FYI

From: ecf_txnd@txnd.uscourts.gov <ecf_txnd@txnd.uscourts.gov>

Sent: Monday, September 18, 2023 3:24 PM

To: Courtmail@txnd.uscourts.gov

Subject: Activity in Case 3:23-cv-00145-S Katz v. Caliber Home Loans, Inc. Waiver of Service Returned

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

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U.S. District Court

Northern District of Texas

Notice of Electronic Filing

The following transaction was entered by Paronich, Anthony on 9/18/2023 at 2:24 PM CDT and filed on 9/18/2023

Case Name: Katz v. Caliber Home Loans, Inc.

Case Number: 3:23-cv-00145-S

Filer:

Document Number: 64

Docket Text:

WAIVER OF SERVICE Returned Executed as to Conversion Kings, LLC. Waiver sent on 9/3/2023. (Paronich, Anthony)

3:23-cv-00145-S Notice has been electronically mailed to:

Anthony I Paronich anthony@paronichlaw.com

Chris R Miltenberger chris@crmlawpractice.com, cmilt@miltenbergerlaw.com,
rkmilt@crmlawpractice.com

Elizabeth Gardner egardner@perkinscoie.com

Jeff Kaplan jkaplan@jamsadr.com, jstephenson@jamsadr.com

Kristine Elizabeth Kruger kkruger@perkinscoie.com

3:23-cv-00145-S Notice required by federal rule will be delivered by other means (as detailed in the Clerk's records for orders/judgments) to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1004035775 [Date=9/18/2023] [FileNumber=15035545-0] [5a633195f9405a304d53f6c833e00928cec57cc933959c2270f9951c61e4f44c4e3fb8213ef2d3c5a5ff59cb4477679f2b786aa092ab2636b4cd6f10cbd080c8]]